



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Allen County
Lima Refining Company
Premise #0302020012
Warning Letter

January 17, 2008

CERTIFIED MAIL

Mr. Roy Warnock, Vice President and General Manager
Lima Refining Company
1150 South Metcalf Street
Lima, Ohio 45804-1145

Dear Mr. Warnock:

The third quarter 2007, Excess Emissions Report (EER) submitted by Lima Refining Company on October 27, 2007, has been reviewed by the Division of Air Pollution Control - Northwest District Office (DAPC/NWDO). Data summaries in the EER indicate continuous emission monitor (CEM) data capture less than the minimum acceptable 95 percent for the following emissions unit:

P040 - Claus No. 1 and No. 2 sulfur recovery units

Specifically, the facility is required to operate an oxygen (O₂) analyzer in conjunction with the sulfur dioxide (SO₂) CEM for this emissions unit, to calculate SO₂ emissions, corrected to zero percent O₂. This calculated value is then compared to the SO₂ emissions limit of 250 parts per million by volume (dry basis), at zero percent O₂. The O₂ analyzer had 86.09 percent data capture (13.91 percent down time) during the third quarter 2007. The excessive down time is a violation of the following:

1. Part III, monitoring and record keeping term A.III.2 for emissions unit P040 in the facility's final Title V permit modification which became effective on November 28, 2005;
2. Part III, monitoring and record keeping term A.III.2 for emissions unit P040 in permit to install modification No. 03-13794; and
3. Ohio Revised Code 3704.05.

Mr. Roy Warnock, Vice President and General Manager
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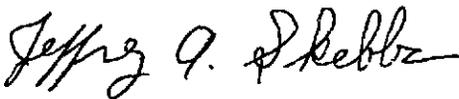
The excessive down time was caused primarily by calibration drift values exceeding 10 percent on the following days:

- July 28 to July 30, 2007 - 48.02 hours of down time due to air leak; and
- September 22 to September 27, 2007 - 120.4 hours of down time due to analyzer high drift on both the SO₂ and O₂ analyzers; and
- September 27 to September 30, 2007 - 87.6 hours of down time due to analyzer span mismatch between the analyzer and the analyzer controller which appeared only during the auto calibration cycle, and lack of analyzer output signal to the computer system.

Corrective actions were completed, which included repairing the air leak and performing a successful manual calibration on July 30, 2007; and completing a manual span adjustment, adjusting the alignment (instrument span) from the analyzer to the control block and reprogramming the analyzer by October 1, 2007.

These corrective actions were completed in a reasonable time frame. If the succeeding quarters EER's for this CEM indicate data capture of at least 95 percent, then the issue is considered resolved. If you have any questions, feel free to contact me at (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Environmental Specialist
Division of Air Pollution Control

/llr

pc: Tom Kalman, DAPC/CO
Don Waltermeyer, DAPC/CO
DAPC/NWDO-File_____

0302020012

Lima Refining Co

1/17/08

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Mr. Robert Warren
1150 S. METCALF STREET
LIMA, OHIO 45804-1145

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1. Article Addressed to:

MR. ROBERT WARREN
Vice President & General Manager
Lima Refining Company
1150 SOUTH METCALF STREET
LIMA, OHIO 45804-1145

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